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Attorneys for Defendants
WC Logistics, Inc. and
AIT Worldwide Logistics, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEKEISHA LINDSEY, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

WC LOGISTICS, INC.; AIT WORLDWIDE
LOGISTICS, INC; DOES 1 through 100,

Defendants.

CASE NO. 3:21-CV-08400-EMC

**JOINT STIPULATION AND ORDER TO
CONTINUE THE HEARING DATE FOR
THE MOTION TO REMAND, MOTION
TO CONSOLIDATE AND INITIAL CASE
MANAGEMENT CONFERENCE FROM
JANUARY 20, 2022 TO FEBRUARY 3,
2022**

Plaintiff Dekeisha Lindsey (“Plaintiff”) and Defendants WC Logistics, Inc. (“WC Logistics”) and AIT Worldwide Logistics, Inc. (“AIT”) (collectively “Defendants”), hereby file this Joint Stipulation and Proposed Order to Continue the Hearing Date for the Motion to Remand, Motion to Consolidate and Initial Case Management Conference (“Joint Stipulation”) from January 20, 2022 to February 3, 2022, at the same date and time that Defendants’ motion to dismiss Plaintiff’s first amended complaint is scheduled to be heard. In support of this Joint Stipulation, the parties respectfully state as follows:

11. On December 21, 2021, the Clerk issued a Notice Rescheduling the Motion to Consolidate Hearing and the Initial Case Management Conference (“CMC”) from January 13, 2022 to January 20, 2022. ECF No. 27.

12. At this time, the following hearings and conferences are set for January 20, 2022 at 1:30 p.m.: Defendants' Motion to Consolidate Hearing (ECF No. 27), Plaintiff's Motion to Remand Hearing (ECF No. 23) and the CMC (ECF No. 27) (collectively the "Hearings").

13. At this time, the following hearing is set for February 3, 2022 at 1:30 p.m.:
Defendants' Motion to Dismiss the Class Action Complaint (ECF No. 22).

14. Defendants' two lead counsel in this case are unavailable for the hearings on January 20, 2022, including because Ms. Walker-Probst will be engaged in a jury trial in Los Angeles County Superior Court and Ms. Adams is out of town due to a pre-scheduled engagement.

15. On December 28, 2021, the parties' counsel met and conferred about the January 20, 2022 and February 3, 2022 dates and have respectfully agreed, subject to the Court's approval, to move the Hearings to February 3, 2022, which is also the date Defendants' Motion to Dismiss the Class Action Complaint will be heard.

16. This request is not being sought to unreasonably delay this action. At this time, all of the motions are fully-briefed. The parties are not requesting an extension of the deadline to file the Case Management Conference Statement due in each action on January 13, 2022.

17. Additionally, the parties believe that this will promote judicial economy and efficiency in the disposition of these actions to hold all related hearings and conferences for these parties on the same date.

18. No prior requests for this relief have been made.

19. Therefore, based on the forgoing, the parties hereby respectfully stipulate and agree that: the Hearings and CMC currently scheduled for January 20, 2022 at 1:30 p.m. will be continued to February 3, 2022 at 1:30 p.m.

1 IT IS SO STIPULATED.

2
3 DATED: January 7, 2022

WOMBLE BOND DICKINSON (US) LLP

4 By: /s/ Nadia D. Adams
5 Kristin Walker-Probst
6 Nadia D. Adams

7 Attorneys for Defendants

8
9 DATED: January 7, 2022

LAWYERS FOR JUSTICE, PC

10 By: /s/ Tara Zabehi
11 Edwin Aiwazian
12 Arby Aiwazian
13 Tara Zabehi

14 Attorneys for Plaintiff

15
16 **ECF ATTESTATION**

17 In accordance with Civil Local Rule 5(i)(3), I, Nadia D. Adams, attest that I have obtained
18 concurrence in the filing of this document from the other signatory listed here.

19
20 DATED: January 7, 2022

By: /s/ Nadia D. Adams
21 Nadia D. Adams

PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO ORDERED THAT:

1. The hearing on Defendants' Motion to Consolidate is continued from January 20, 2022 at 1:30 p.m. to February 3, 2022 at 1:30 p.m.
2. The hearing on Plaintiff's Remand Hearing is continued from January 20, 2022 at 1:30 p.m. to February 3, 2022 at 1:30 p.m.
3. The Initial Case Management Conference is continued from January 20, 2022 at 1:30 p.m. to February 3, 2022 at 1:30 p.m.

Date: January 12, 2022



The Honorable Edward M. Chen,
District Court Judge